APPENDIX 3

PUBLIC INVOLVEMENT

Environmental Assessment Number OR-086-04-02

The EA (Environmental Assessment) and Finding of No Significant Impact issued for the Stoned Gopher Density Management Thinning project were made available for a 30-day public review period on June 4, 2004. Notification of the comment period included: publication of a legal notice in the *Headlight Herald* and *News-Register*, newspapers of Tillamook and McMinnville, Oregon, respectively; a letter mailed to those individuals, organizations, and agencies that have requested to be involved in the environmental planning process for proposed timber sales; and posting on the Internet under Environmental Assessments at http://www.or.blm.gov/salem/html/planning/index.htm (Project Record, Documents 3-7).

A total of one letter was received as a result of this scoping effort (Project Record, Document 9). All comments presented in this document are direct quotes from the letter received, and were categorized into five areas: 1/ Road Building; 2/ Thinning; 3/ Soil and Water Quality; 4/ Spotted Owls; and 5/ Coarse Woody Debris and Snags. These comments were considered by the Tillamook Field Manager, Salem District, BLM (Bureau of Land Management) in reaching a final decision for this project.

Project Record Document 9 – Oregon Natural Resources Council

1/ Road Building
comment a: Building a new road will only exacerbate the problems of soil compaction and noxious weeds noted in the EA. The BLM should consider avoiding building the 1,200 foot spur road proposed here by treating some areas non-commercially (e.g., thin lightly, create lots of snags, and leave the material on site).
comment b: The agency lacks the funds to maintain existing roads, so it is arbitrary and capricious to build more.
comment c: Research results, published in *Restoration Ecology*, shows there is nothing temporary about temporary roads, and that ripping out a road is NOT equal to never building a road to begin with.

BLM response to comments a-c: The referenced spur road would access proposed treatment unit 10-1. The stand in this unit is quite dense, fairly uniform in size (12.5 inch average diameter at breast height) and spacing, and consists of a single story canopy layer of Douglas-fir.

The *Late-Successional Reserve Assessment for Oregon's Northern Coast Range Adaptive Management Area* identified this area as part of the mixed seral/corridor landscape cell and zone. The management goal for this cell/zone is to "grow out" from adjacent large blocks of late seral forest and create/enlarge existing patches of late seral forest within the zone. Consistent with this goal one of the objectives of the treatment described in Chapter 2 of the EA for this unit is to accelerate the development of some late-successional forest structure including large trees, gaps in the canopy, snags and down logs, and various levels of understory development.

In order to accomplish the proposed treatment in unit 10-1, the construction of a 1,175 foot spur road is needed. This spur road would be built by the timber sale purchaser on a stable bench near the ridge top, would not cross any streams, and would be decommissioned at the end of the timber sale contract. Given the location of the spur road, the risk of erosion is low and water quality would not be affected (EA, Chapter 3 and Appendix 2). Although construction of the natural surfaced road would result in some soil compaction, as disclosed in Chapter 3 of the EA, the potential impacts to soil productivity would be reduced or avoided with the implementation of design features (Best Management Practices) and would be mitigated through decommissioning (subsoiling, waterbarring, seeding and blocking). Subsoiling would help reduce impacts by loosening up the compacted soil, improving soil infiltration and preparing a more favorable environment for plants and soil organisms. The effects on the elements of the human environment of commercially treating unit 10-1 are within those anticipated in the Final Environmental Impact Statement for the Salem District Resource Management Plan.

Given the stand condition in unit 10-1, the application of a non-commercial treatment as you suggest would notably delay the achievement of the management goals and objectives, as well as require the expenditure of additional appropriated dollars over a number of years.

In weighing all the factors mentioned above it is not prudent to implement your suggestion as the long-term benefits of the proposed treatment out-weigh impacts.

2/ Thinning
comment d: Thinning must be done very carefully (and in many cases avoided) in order to avoid, minimize, and mitigate logging's numerous adverse ecological effects.
comment e: Thinning should focus on the smallest trees that have established due to recent planting or fire suppression and leave a healthy canopy of medium and large trees that are so valuable for wildlife habitat and as future sources of large snags and large down wood.
comment f: Thinning in stands of trees that are not yet of "pool forming" size should be beneficial, but after trees are pool-forming size thinning might just capture and remove the mortality that should end up in the stream.
comment g: Make sure long-term benefits out-weigh short-term degradation.
comment h: The EA mentions that thinning will be done in a "variable spaced manner", but does not give specifics of the harvest prescription. To gain the benefits of VDT, it must be done right. This means that thinning should be done in a way that creates ¼ to ½ acre gaps, dense patches, lightly thinned, moderately thinned, and heavily thinned patches in every stand.

BLM response to comments d-h: We agree with your comments that thinning must be done carefully and that long term benefits should out-weigh adverse impacts. We believe this project is designed in such a manner as to achieve the objectives identified in Chapter 1.3 of the EA while minimizing the potential for adverse impacts. We encourage you to contact this office to schedule a field trip to review some variable density thinning projects on the Tillamook Resource Area, including our Stoned Gopher project.

3/ Soil and Water Quality
comment i: Soil disturbance caused by logging, road building, skid trails, and pile burning also causes erosion that adversely impacts both soil and water resources.
comment j: The EA correctly finds that sedimentation will occur from haul roads and cumulative effects such as road building and logging. It also finds that soil on 29 acres in the project area already significantly impacted by logging and that 18 more acres will be impacted after the project is complete.
comment k: Soil productivity must be zealously guarded in order to protect our forests for future generations. This project will cause unacceptable impacts to soil resources.
comment l: This project should use less ground-based logging and drop the planned road to reduce impacts on soil and water quality in the project area.

BLM response to comments i-l: We disagree with your conclusion that the proposed project would cause "unacceptable impacts to soil resources". On page 26 of the EA we disclose that timber productivity has been reduced by 50% on 29 acres through past ground-based yarding activities in the project area. The EA goes on to disclose that timber productivity would be reduced by 50% on an additional 18 acres from the proposed spur road construction (1,175 feet) and ground-based logging of 116 acres. The management prescription, that includes the implementation of Best Management Practices, would limit the extent and duration of adverse soil impacts. The effects of the proposed project on soils are within those anticipated in the FEIS (Final Environmental Impact Statement) for the Salem District Resource Management Plan, and as such do not rise to the level of "unacceptable impacts".

The proposed action is consistent with BLM policy (H-5420-1, Oregon State Office Rel. 5-247, Appendix 1, .24) that requires "the lowest cost methods to accomplish project objectives, while providing, but not exceeding, the necessary or required level of environmental protection (e.g., not requiring a more expensive logging system to mitigate impacts below the level of impact anticipated in the relevant environmental impact statement and land use plan)." Since the level of environmental impacts on soil resources do not exceed those anticipated in the FEIS, it would be inconsistent with BLM policy to use less ground-based logging as you suggest as the alternative logging method (e.g., cable-yarding) would be more costly.

Also refer to BLM response to comments a-c regarding your suggestion to drop the planned road in unit 10-1.

4/ Spotted Owls
comment m: This project will disturb owls during the nesting season and temporarily disrupts suitable dispersal habitat in the project area.
comment n: Delaying hauling until after the nesting period is a good step, but if possible thinning activities closest to suitable habitat should also be delayed.

BLM response to comments m-n: The proposed action would occur on lands considered to be spotted owl dispersal habitat. This is based, in part, on the relatively young stand age (47-83 years) of the areas proposed for the treatment and the resultant simple forest structure and high stand density. There is no suitable spotted owl habitat within the proposed treatment units nor are there any known spotted owl sites within the vicinity of the Stoned Gopher project. Dispersal habitat is not currently lacking within the areas proposed for treatment. Consistent

with the United States Fish and Wildlife Service's Biological Opinion (1-7-02-F-958) we have scheduled the implementation of this project as late in the breeding period as feasible (as you suggested); this is due in part to its proximity to unsurveyed suitable owl habitat.

comment o: Barred owl competition and displacement are significant concerns emerging in the status review for the northern spotted owl. There are at least four new reports and presentations raising concern that barred owls could displace spotted owls and adversely affect their survival.
comment p: The impact of the barred owl on the spotted owl was barely considered when the Northwest Forest Plan was approved in 1994. One of the implications of barred owl competition and the overall decline of the spotted owl is that the agencies may need to protect all the remaining mature and old growth forest habitat in order to increase the chances that spotted owls and barred owls can co-exist.
comment q: In order to retain options while this issue [barred owl/spotted owl] is being sorted out the agency must consider protecting all remaining old forest. When we are losing population "sinks", conserving the remaining population "sources" become even more important.

BLM response to comments o-q: Since the stands proposed for treatment do not fall within the definition of mature or old growth forest habitat, we do not understand the relevance to this project of your concern to protect all remaining mature and old growth forest habitat.

The upcoming revision of the Western Oregon resource management plans should address your barred owl/spotted owl concern. We encourage you to share these concerns during that landscape-planning process.

5/ Coarse Woody Debris and Snags
comment r: The EA for this project notes, numerous times, that there is a deficit of coarse woody debris (CWD) and snags in the project area, yet it does little to address this problem through project plans.
comment s: This project should include provisions for creating and maintaining CWD and snags.
comment t: The agency must avoid any reduction of existing or future large snags and logs (including as part of this project) until the applicable management plans are rewritten to update the snag retention standards.
comment u: The snag retention requirements in the applicable management plan Standards and Guidelines for this project fail to retain enough snags to provide habitat for viable populations of cavity dependent species.
comment v: Abundant logs help meet aquatic objectives.
comment w: Avoid conflicts between snags and safety by keeping workers out of the hazard zone.

BLM response to comments r-w: The proposed treatment units are forested with 47 to 83-year-old timber which is predominately dense, uniform Douglas-fir. All of these stands most likely regenerated naturally following fire. These stands are currently not in a condition to provide the recommended levels or sizes of CWD identified for a healthy functioning forested environment in the *Late-Successional Reserve Assessment for Oregon's Northern Coast Range Adaptive Management Area*. As such, the proposed action was designed with one of the objectives of growing larger trees that could become future sources of high-quality CWD - both

snags and down logs. Specifically, these larger trees could be converted to snags over time, to help meet snag habitat targets, or felled to provide large woody debris habitat components.

While the proposed density management project is expected to alter the natural regime of CWD recruitment within the treatment units relative to the no action alternative, the short- and long-term adverse impacts upon the viability of populations of cavity dependent species are expected to be negligible. This is based on several factors including the relatively small size and dispersed nature of the treatment units, the majority of the proposed treatment units are interspersed with stands of mature forest where CWD of an appreciable size is expected to continue to be naturally recruited, and a number of additional project design features specifically designed to minimize adverse impacts to current and future CWD habitat components. The proposed action includes the following CWD management prescription that we believe is appropriate for the stage of stand development found within the various proposed treatment units (EA, pp. 10-11):

1. Within the patch cuts in unit 10-1, three to four trees per acre would be converted to snags or felled to augment CWD after the timber sale was completed.
2. Retain and protect to the greatest extent possible green trees with characteristics desirable to wildlife (broken or forked tops, hollow cavities, large limbs), all hardwoods (to protect the current diversity of the treated stands), all existing snags (with the exception of those necessary to cut for reasons of safety), and all existing downed logs.
3. Existing snags greater than 24 inches DBH (diameter at breast height) would be surrounded with two or more leave trees to help protect them from logging damage.
4. Unthinned clumps of about ten Douglas-fir trees at the rate of one such clump per two acres in the 47- to 53-year-old stands, and clumps of about five Douglas-fir trees at the rate of one such clump per two acres in the 68- to 83-year-old stands would be retained to add to the general diversity of the area and to serve as potential sources of CWD (both snags and downed logs) as some of these trees naturally die of suppression.
5. Two or more conifers spaced 10-feet or less apart at the rate of approximately two such "groups" per acre would also be reserved within all treatment units. When evaluated and if appropriate, one of these trees could be converted into a snag thus creating a "protected" snag for use by wildlife.
6. Where tractor skid trails or skyline corridors are constructed, all reserved trees greater than 20 inches DBH that are cut for that construction would be left on-site to augment current CWD levels.

We intend to reserve all of the legacy features that currently occur within the proposed treatment units (EA, page 10; also see bullet statements 2 & 3 above). However, a thinning operation requires that certain safeguards for workers be in place, which means that some trees or snags that are found to be hazardous to workers may be cut. Some of the existing snags, most likely the smaller snags within the treatment areas, are also expected to be damaged or knocked down during the harvest operation. All felled snags as well as those inadvertently knocked over will be retained on site to augment CWD levels. The majority of the snags expected to be knocked over or felled during the logging operation are of limited habitat value due to their small size and/or lack of structural stability; they are not expected to stand very long regardless of harvest activity.

We plan to implement a limited level of snag creation and log retention within the project area. This is being done not so much as to create superior habitat immediately after harvest, but rather in consideration of managing CWD levels in a range of decay classes across time. In order to help meet our management objectives through multiple entries it is beneficial to input some newer, larger snags and logs on the landscape and in the treatment units until such time that larger trees develop within the treatment units and converted to snags either naturally or by a future planned action.